

**REMARKS**

The present invention is a portable telecommunication apparatus for requesting download of pages of information from a remote source and a method of requesting the download of pages of information from a remote source in a portable apparatus. In accordance with the invention, the portable telecommunication apparatus receives pages of information, such as pages in HTML (Hypertext Mark up Language) encoded, for example, from the World Wide Web (WWW). See page 6, lines 1-7, of the specification. The received pages include encoded information identifying links to other pages which, for example, may contain an anchor tag to identify the link to the other pages. See page 7, lines 10-31, thru page 8, lines 1-13, of the specification. A display 115, 210 and 415 is used to display the links to other pages. A fixed location input key or keys 125, 425 and 525 permit the user by actuation to request the linked page specified by the particular link associated with the key to be sent as if the user had been able to select the link using a mouse and a cursor. See page 8, lines 24-29; page 10, lines 10-23; and page 11, lines 1-17, of the specification. The microprocessor 205 consistently associates the input key or input keys with the encoded information identifying a linked page during a display period such that actuation of the input key or the input keys during a display period requests the respective linked page or pages for download from the remote source. See page 7, lines 10-31, through page 8, lines 1-29, of the specification.

Claims 1-14 and 16-19 stand rejected under 35 U.S.C. §103 as being unpatentable over WO 99/35595 (Lahtinen) and United States Patent 5,854,624 (Grant). The Final Rejection essentially repeats the first Office Action with the

exception of the Response to the Applicants Arguments in Section 3 which will be addressed below. These grounds of rejection are traversed for the following reasons.

Independent claim 1 recites:

A portable telecommunication apparatus for requesting the download of pages of information from a remote source comprising:  
means for receiving the pages of information including encoded information identifying links to other pages;  
a display for displaying the received pages;  
a fixed location input key; and  
a processor for consistently associating the fixed location input key with the encoded information identifying a linked page during a display period such that actuation of the fixed location input key during the display period requests the respective linked page for download from the remote source.

and Independent claim 14 recites:

A method of requesting the download of respective pages of received information from a remote source in a portable apparatus, comprising:  
receiving pages of information including encoded information identifying links to other pages;  
identifying linked pages from the encoded information, the encoded information including a functional element for consistently associating operation of an identified input device with a request for download of the linked page from the remote source, and a visual element for labelling the operation;  
separating the labelling and functional elements of the encoded information;  
displaying the labelling information at a predefined position; and  
defining the function of the identified input device using the functional element of the encoded information such that on operation of the identified input device the linked pages are requested for download.

Each of the independent claims requires receiving pages of information including encoded information identifying links to other pages. This subject matter is not taught by Lahtinen who employs a different methodology of transmitting hyperlinks separately from the contents of the page. Page 2, lines 29-33, of Lahtinen

specifically teach that "[f]urther, according to the invention, the hyperlinks contained in the hypertext page to be transmitted to the mobile station and the rest of the contents of the page are transmitted to the mobile station separately from each other." Accordingly, Lahtinen, contrary to what the Examiner states in the Final Rejection, does not teach the "means for receiving the pages of information including encoded information identifying links to other pages" as recited in claim 1 and "receiving pages of information including encoded information identifying links to other pages" as recited in claim 14.

It is noted that the Examiner cites page 3, lines 22-28, of Lahtinen for the aforementioned subject matter. However, what is described at page 3, lines 22-28, is the selection of hyperlinks by the use of softkeys. It is submitted that this does not teach, as the Examiner contends in the second paragraph of the Final Rejection, "means for receiving respective pages of information including encoded information for identifying respective links to other pages." As noted above, page 2, lines 29-33, expressly teach to the contrary. Moreover, page 2, lines 34-37, through lines 1-4 of page 3, teach that the hyperlinks are separately transmitted in a form comprising descriptions of the links as, for example, in a menu format, as well as link specific identification data, such as, for example, a code by which the conversion means can find the link corresponding to the description and its URL address in the information saved. This is a different methodology than that set forth in the claims which is much simpler in that the links are directly embedded with the pages. Through the action of a fixed location input key or keys, as recited in claims 1 and 2 or an identified input device, as recited in claim 14, a request is made for the linked page to be downloaded from the remote source. Moreover, the flowchart of Fig. 1 clearly

illustrates as the second step, that the text of the desired page is transmitted to the mobile station, the user reads the text and then a TTML form containing descriptions of the links to the pages is transmitted to the mobile station which clearly demonstrates the separate transmission described at page 2, lines 29-33 of Lahtinen. It is the menu of hyperlinks that are displayed which are transmitted separately that is described at page 3, lines 26-28, which does not meet the limitations of the claims.

Moreover, the Examiner correctly observes that "Lahtinen does not teach associating the input key with the link page such that actuation of the input key during the display period requests the respective link page for download from the remote source". The Examiner's reliance upon Grant to cure this deficiency is misplaced. The Examiner states that Grant teaches the display of labelling at predefined position 54 which may display the URL address as stated in column 4, lines 41-49. However, while a display of a URL address is possible, there is no "processor for consistently associating the fixed location input key with the encoded information identifying a linked page during a display period such that actuation of the input key during the display period requests the linked page for download" as recited in claim 1 and "defining the function of the identified input device using the functional element of the encoded information such that on operation of the input device the linked pages are requested for download" as recited in claim 14. Grant teaches a number of preprogrammed keys 58, user programmable keys 60 and navigating keys 62, none of which correspond to the launching of the download of a web page as recited in the claims. As stated above, the display 54 cannot be read

upon the fixed location input key or keys of claims 1 and 2 and the input device of claim 14 since the display is only an output to the user.

It is submitted that the enter function F4 of the programmable keys 60 would not suggest to a person of ordinary skill in the art that a URL displayed on the display 54 would be consistently associated with the displayed URL since the F4 enter function is a mouse-like function which is not dedicated to downloading pages.

Claim 1 explicitly calls for a processor for consistently associating the fixed location input key with the encoded information identifying a linked page during a display period such that actuation of the input key during the display period requests the linked page for download from the remote source. The description of the enter function at the bottom of page 5 of Grant does not meet this limitation. Similarly, claim 14 recites identifying linked pages from the encoded information the encoded information including a functional element for consistently associating operation of an identified input device with the request for download of the linked pages from the remote source which also is not met. Since the enter programmable key providing the F4 function also has other functions, it does not consistently associate operation of the identified input device as recited in the claims.

The Examiner's Response to Arguments do not rebut the differences between Lahtinen and Grant as discussed above. As pointed out above, Lahtinen teaches that the hyperlinks are sent separately from the pages. The Examiner's suggestion that Lahtinen in combination with Grant meets the claimed processor is not correct since, as has been pointed out above, Grant does not consistently associate operation of an input key or an identified input device with a request for download of

linked pages by operation of any of the input keys, including the F4 function of the programmable keys.

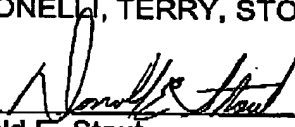
Finally, it is submitted that if the proposed combinations of references were made, the claimed subject matter would not be achieved.

In view of the foregoing amendments and remarks, it is submitted that each of the claims in the application is in condition for allowance.

To the extent necessary, Applicants petition for an extension of time under 37 C.F.R. §1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 01-2135 (1154.39383X00) and please credit any excess fees to such Deposit Account.

Respectfully submitted,

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